

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,	) Docket No. 05-76E
	) (SEAN J. MCCLAUGHLIN)
Plaintiff,	)
	) ELECTRONICALLY FILED PLEADING
vs.	)
	) JURY TRIAL DEMANDED
COUNTY OF ERIE, ERIE COUNTY	)
OFFICE OF CHILDREN AND YOUTH,	) APPENDIX OF EXHIBITS TO COUNTY OF
a/k/a ERIE COUNTY CHILD WELFARE	) ERIE's, et al. CONCISE STATEMENT OF
SERVICE, RICHARD SCHENKER,	) MATERIAL FACTS IN SUPPORT OF
individually and in his capacity as County	) MOTION FOR SUMMARY JUDGMENT
Executive of Erie County, Pennsylvania,	)
PETER CALLAN, individually and in his	) Counsel of record for this party:
capacity as Erie County Director of	)
Personnel, DEBRA LIEBEL, individually	) Richard A. Lanzillo, Esq.
and in her capacity as Executive Director,	) Knox McLaughlin Gornall
Erie County Office of Children and Youth,	) & Sennett, P.C.
a/k/a Erie County Child Welfare Service	) 120 West 10 <sup>th</sup> Street
and JOHN A. ONORATO, ESQUIRE,	) Erie, PA 16501
individually and in his capacity as Erie	) Telephone (814) 459-2800
County Solicitor,	) Facsimile (814) 453-4530
	) Email rlanzillo@kmgslaw.com
Defendants	) PA53811

**APPENDIX OF EXHIBITS OF**  
**COUNTY OF ERIE, ERIE COUNTY OFFICE OF CHILDREN AND YOUTH, AND**  
**INDIVIDUAL DEFENDANTS (IN THEIR OFFICIAL CAPACITIES) TO**  
**CONCISE STATEMENT OF MATERIAL FACTS IN SUPPORT OF**  
**MOTION FOR SUMMARY JUDGMENT**

Defendants, the County of Erie, Office of Children and Youth, and individual defendants Richard Schenker, Peter Callan, and Debra Liebel, in their official capacities, incorporate by reference Exhibits 1-26 of the Exhibits to Motion for Summary Judgment filed on behalf of defendant John Onorato, and submit Exhibits 27-36, listed below, as additional exhibits in support of their Motion for Summary Judgment:

**ONORATO EXHIBITS**

- Exh. 1. Abby Conley resignation letter dated 9/10/04;
- Exh. 2. 8/30/04 letter from Shara Saveikis to Debi Liebell;  
7/2/04 letter from Shara Saveikis to PW;
- Exh. 3. Deposition Transcript of Shara Saveikis (DPW) taken 3/8/06;
- Exh. 4. Deposition Transcript of Abby Conley taken 9/06/05;
- Exh. 5. 6/09/04 Contact/Safety assessment by Abby Conley re: VW
- Exh. 6. Permanency Hearing Transcript of 7/28/04 (C Case);
- Exh. 7. Deposition Transcript of Debra Liebel dated 3/09/06;
- Exh. 8. Deposition Transcript of Michael Cauley, Esq. taken 3/09/06;
- Exh. 9. 8/20/04 Letter and memorandum from Michael Cauley to John Onorato re: Abby Conley;
- Exh. 10. Two emails from Conley's business email to personal email 5/4/04;
- Exh. 11. 5/20/04 email from Deanna Cosby to Abby Conley and return email;
- Exh. 12. 5/25/04 emails from Deanna Cosby to Abby Conley re: reporters, a child's death, OYC going down in flames;
- Exh. 13. 5/27/04 email from Abby Conley to Deanna Cosby re; wanting her to call VW's attorney;
- Exh. 14. 6/04/04 through 6/7/04 emails Abby and Deanna re: VW in labor, not seeing the detaining order coming;
- Exh. 15. 6/11/04 emails from Abby and Deanna re: Sue calling Abby into office about emailing client information outside office;
- Exh. 16. 6/11/04 email from Abby to Deanna re: Michele Shetter looking at Abby's e-mails;
- Exh. 17. 6/11/04 email from Deanna to Abby regarding speaking to an attorney about email system;

- Exh. 18. 6/11/04 emails from "Attorney Mike Fisher" to Abby regarding her emails being read by Michele;
- Exh. 19. 6/28/04 email from Deanna to Abby regarding the 4 questions (w/answers);
- Exh. 20. 7/9/04 e-mails from Abby to Sue Deveney regarding their 7/08/04 meeting regarding confidentiality;
- Exh. 21. 7/12/04 email from Abby to Pam Biroscak regarding her meeting with Sue and repercussions of testifying;
- Exh. 22. 7/20/04 emails from Abby and Deanna re: not e-mailing need to talk on phone;
- Exh. 23. 1/17/05 Article from Times News regarding cost of defending the ouster of Abby Conley;
- Exh. 24. 9/17/04 Article from Times News regarding Abby Conley's resignation because of disclosing a phone number;
- Exh. 25. Transcript of Hearing on Motion to Compel of 1/4/06;
- Exh. 26. Abby Conley Grievance Form from Local 13.

**ADDITIONAL EXHIBITS TO MOTION FOR SUMMARY JUDGMENT**

- Exh. 27. 5/27/04 Prognostic Detention Order;
- Exh. 28. Deposition Transcript of Mary Jo Cline Szewczyk taken April 6, 2006;
- Exh. 29. Affidavit of Mary Jo Cline Szewczyk dated April 10, 2006;
- Exh. 30. Deposition Transcript of Richard Vendetti taken March 20, 2006
- Exh. 31. Deposition Transcript of P.W. taken April 03, 2006;
- Exh. 32. Deposition Transcript of V.W. taken April 6, 2006;
- Exh. 33. Affidavit of Gerald J. Villella dated April 11, 2006;
- Exh. 34. Deposition Transcript of Amy Jones taken April 7, 2006;
- Exh. 35. Deposition Transcript of John Onorato taken April 3, 2006;
- Exh. 36. Deposition Transcript of Richard Schenker taken April 7, 2006.